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February 2, 2009

Mr. Ian Peterson
Office of Planning and Research
1400 10th Street
PO Box 3044
Sacramento, CA 95814

SUBJECT: Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions

Dear Mr. Peterson:

On behalf of its thirty member counties, the Regional Council of Rural Counties (RCRC) appreciates this opportunity to offer comments on the proposed CEQA Guideline Amendments for Greenhouse Gas Emissions. We also appreciate the Office of Planning and Research (OPR) staff's efforts to work with local government during the development of the Guideline amendments (Amendments).

We are most appreciative that the Amendments maintain the Lead Agency's discretion over determining significant impacts/thresholds and appropriate mitigation measures, without prescribing mitigation or specifying a hierarchy. We also agree with OPR that the Amendments address Greenhouse Gas (GHG) emission reductions/goals as opposed to Climate Change or Global Warming, as the latter addresses a global issue with potential consequences that a local jurisdiction is unable to address without requiring an Environmental Impact Report and Statements of Overriding Consideration for every project. RCRC believes that it is imperative to preserve the Lead Agencies' local discretion and the environmental review process flexibility.

We understand that some stakeholders feel the Amendments are too broad and vague and need more prescriptive requirements. RCRC would also like to offer our comments on the following issues:

- RCRC does not object to the reference of climate action plans, regional transportation plans, regional blueprint plans, sustainable community strategies, and statewide plan of mitigation for GHG emissions to be included in the list of previously approved plans and programs in the Amendments. However, we request that "or local" be inserted after "statewide" in "statewide plans of mitigation for GHG".

- RCRC supports the inclusion of carbon offsets and sequestration as potential mitigation without specifying a hierarchy.
- RCRC supports the change of “commencement” to “completion” in section 15065(b)(1).
- RCRC supports not including a threshold of significance; but including a list of things to look at including other agency recommendations.
- RCRC does not object to the deletion of “Level of Service” and other changes in the transportation section of Appendix G.

RCRC urges OPR to maintain the local discretion and process flexibility. We thank you for the opportunity to participate in the process. If you have any questions, you may call me at (916) 447-4806.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Pitto". The signature is fluid and cursive, with the first name "Mary" and the last name "Pitto" clearly distinguishable.

Mary Pitto
Regulatory Program Director

cc: Terry Roberts, Director, State Clearinghouse, OPR
RCRC Board of Directors